

Susan P. Kennedy
Commissioner
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

**Re: R. 01-08-028, Assigned Commissioner's Ruling Requesting
Information in Response to the Governor's Executive Order S-20-04**

Dear Commissioner Kennedy:

I am writing on behalf of the Alliance to Save Energy (Alliance) to provide comments in response to your Assigned Commissioner's Ruling (ACR) dated December 29, 2004.

The Alliance supports the efforts of the Commission to take advantage of the Governor's Executive Order to gather new ideas and promote reflection on how the CPUC-funded energy efficiency programs can be enhanced.

In particular, the Alliance will respond to the following two questions:

(4) How are current programs supporting a campaign to inform building owners and operators about the compelling economic benefits of energy efficiency measures? Should a single, statewide campaign be initiated for this purpose? How might authorized funds for the 2004-2005 program year be redirected to support such an effort?

(7) How might CPUC-funded energy efficiency programs be modified or enhanced to help achieve the reductions in per square footage electricity use for commercial buildings, as directed in the Green Buildings Executive Order?

The Alliance to Save Energy operates two CPUC-funded programs, both of which educate young people about energy efficiency: the Green Schools Program and the Green Campus Programs. Both these are categorized as information-only programs, with no hard targets for savings energy, but each program does provide energy savings, both in the short and the long term.

The Green Schools Program educates students about energy and its connections to the environment and to finances, and to save energy in schools. Students learn the reasons for saving energy at school and at home, and develop action plans to reduce energy waste in their school, with support from teachers and custodians. The Alliance has brought Green Schools Program to nearly 200 schools in California over the past four years, with typical electricity savings in the range of five to 15 percent. These energy savings are only the tip of the iceberg, however. High school students learn to perform energy audits of their schools and present retrofit recommendations to administrators and school

boards. Students often become passionate advocates of energy efficiency and stimulate others to save energy as well, including district facilities staff, school boards, their parents, and small businesses. This hands-on efficiency experience also interests young people in careers in energy efficiency.

The Green Campus Pilot Program, currently being piloted in three University of California campuses and three California State University campuses, saves energy in university facilities, educates the campus community and promotes student leadership about energy. It focuses its energy-saving activities primarily on dormitories, which are often left out of the capital improvement projects that address the academic and administrative buildings. Energy savings accomplishments are not complete at this time but are expected to be significant.

Schools are notoriously difficult to engage in efficiency retrofitting activities, facing the barriers of extremely tight funding, increased pressure to raise student test scores, and the lack of accountability at the school level for energy costs. Many excellent programs are in place that are working to address these barriers and are making progress. More can and must be done, however, both to reduce energy use and to provide a model to California's young people in California for the wise use of energy.

We see three ways that the state can encourage schools to increase energy savings.

First, we support the comments of NAESCO and others on the use of the Environmental Protection Agency's Energy Star Program to help school administrators understand the opportunities they have to save energy. With no way to compare their energy intensity with other schools, school administrators can easily assume that they are already doing all they can to save energy. The Energy Portfolio Manager Program offers information on energy consumption that controls for weather and climate, size, and a variety of other building characteristics. The result is a ranking system that lets administrators know the potential dollar savings offered by each of their facilities and allows them to target investments to the schools that will generate the greatest return. This tool will also lead school districts to other CPUC-funded programs that can help them implement retrofits and manage energy use wisely.

Second, we suggest that the CPUC, as part of the next round of funded programs, develop a state-wide task force to develop a comprehensive approach to school energy efficiency. The programs currently available to school districts to assist them in implementing energy efficiency are a patchwork of efforts that may or may not coordinate with each other or address all the barriers. A state-wide task force made up of California leaders in the education and efficiency fields would be the best effective entity to address the barriers to implementing efficiency measures, and develop a comprehensive plan for addressing those barriers.

Third, the CPUC should consider, for the next round of CPUC-funded programs, a state-wide incentive program for school districts or counties offices of education that would recognize and reward schools districts for programs that save energy and involve students

in energy efficiency activities. The incentive could take the form of dollars that could be used to fund additional energy efficiency activities; since school funding is so tight this could be a significant source of funds for efficiency. This program could incorporate the new California **K-12 Model Environmental Curriculum**, which sets standards for energy as part of environmental learning. This would encourage schools to mine the savings that can be achieved by simply reducing waste in lighting, computers and plug loads, as well as HVAC and operational waste. Most schools have ample opportunities to save up to 15 percent or even more in some cases. These savings can be achieved through no- or low-cost measures, involving students, teachers and custodians. Hands-on, inquiry-based student learning that use the building as a learning laboratory make the activity one that strengthens student achievement.

Finally, it is critical that the effort to maximize immediate energy savings in buildings not crowd out the critical but longer-term task of educating California students about energy efficiency. The opportunity for students to develop in-depth understanding of energy issues, while their full-time job is learning, is unique to this building type and should not be lost in a push to simply count kilowatt hours.